



EX PARTE OR LATE FILED

TEL +1-202-872-0030
FAX +1-202-872-1331
WEB PAGE: www.utc.org

Jeffrey L. Sheldon
VP & General Counsel
202-872-0031, ext. 216
jsheldon@utc.org

December 18, 1998

RECEIVED

DEC 18 1998

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, D.C. 20554

Ex Parte

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Multiple Address Systems
WT Docket No. 97-81

Dear Ms. Salas:

Pursuant to Section 1.1206 of the Commission's Rules, this is to notify you that the following persons, representing the organizations listed, made an oral presentation to the staff of the Public Safety and Private Wireless Division of the Wireless Telecommunications Bureau regarding the licensing of multiple address systems (MAS) in the 900 MHz band (WT Docket No. 97-81):

<u>Name</u>	<u>Representing</u>
Jeffrey Sheldon	UTC, The Telecommunications Association
Jerry Obrist	Lincoln Water System and the American Water Works Association
Curtis White (Law Office of Curtis White)	East Bay Municipal Utility District
Wayne Black (Keller & Heckman)	American Petroleum Institute
Thomas Keller (Verner, Liipfert, Bernhard, McPherson & Hand)	Association of American Railroads

The parties summarized the arguments advanced in their "Joint Supplemental Comments" filed in this docket on October 30, 1998. A copy of the written materials used during the presentation are appended hereto.

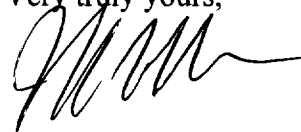
No. of Copies rec'd 04/
List ABCDE

Ms. Magalie Roman Salas
December 18, 1998
Page Two

Two copies of this notice are being submitted for filing in the docket of this proceeding.

If there are any questions concerning this matter, please let me know.

Very truly yours,

A handwritten signature in black ink, appearing to be 'JLS', with a long horizontal flourish extending to the right.

Jeffrey L. Sheldon
VP & General Counsel

cc: D'wana Terry, FCC
John Borkowski, FCC
Shellie Blakeney, FCC
Ron Quirk, FCC
Max Gale, FCC

**POSITION OF THE
CRITICAL INFRASTRUCTURE INDUSTRIES
ON
MULTIPLE ADDRESS SYSTEM (MAS) LICENSING
WT DOCKET NO. 97-81**

I. Utilities, Railroads and Pipelines Make Extensive Use of 900 MHz MAS

A. Typical Uses:

- Utilities -- supervisory control and data acquisition (SCADA); line switching; water system monitoring and flow control; gas system pressure controls
- Railroads -- real-time switching and signaling; telemetry
- Pipelines -- SCADA; oil and gas well monitoring; pressure differentials; alarms

B. Critical Infrastructure Industries (CII) are the largest group of non-commercial MAS licensees

C. As CII operations become more sophisticated, and as protection of the nation's critical infrastructure receives greater attention, there will be an increasing need for MAS spectrum.

II. MAS Licenses Used By CII Eligibles Are Exempt From Auctions

A. MAS systems are "private internal radio services used by State and local governments and non-government entities...that (i) are used to protect the safety of life, health or property; and (ii) are not made commercially available to the public." 47 U.S.C. §309(j)(2).

B. "[T]he exemption from competitive bidding authority [in §309(j)(2)] for 'public safety radio services' includes 'private internal radio services' used by utilities, railroads, metropolitan transit systems, pipelines, private ambulances, and volunteer fire departments." Conf. Report, H.R. Rep. No. 105-217 at 572 (1997) (emphasis added)

III. Conclusion

A. Designate for CII use:

1. Existing 928/952/956 MHz channels (but grandfather existing *systems* licensed to non-CII eligibles).
2. At least 20 new channel pairs at 932/941 MHz.

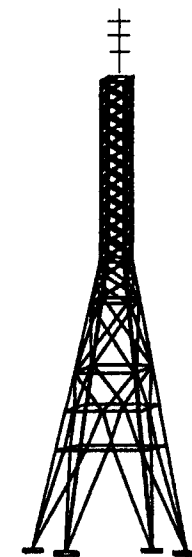
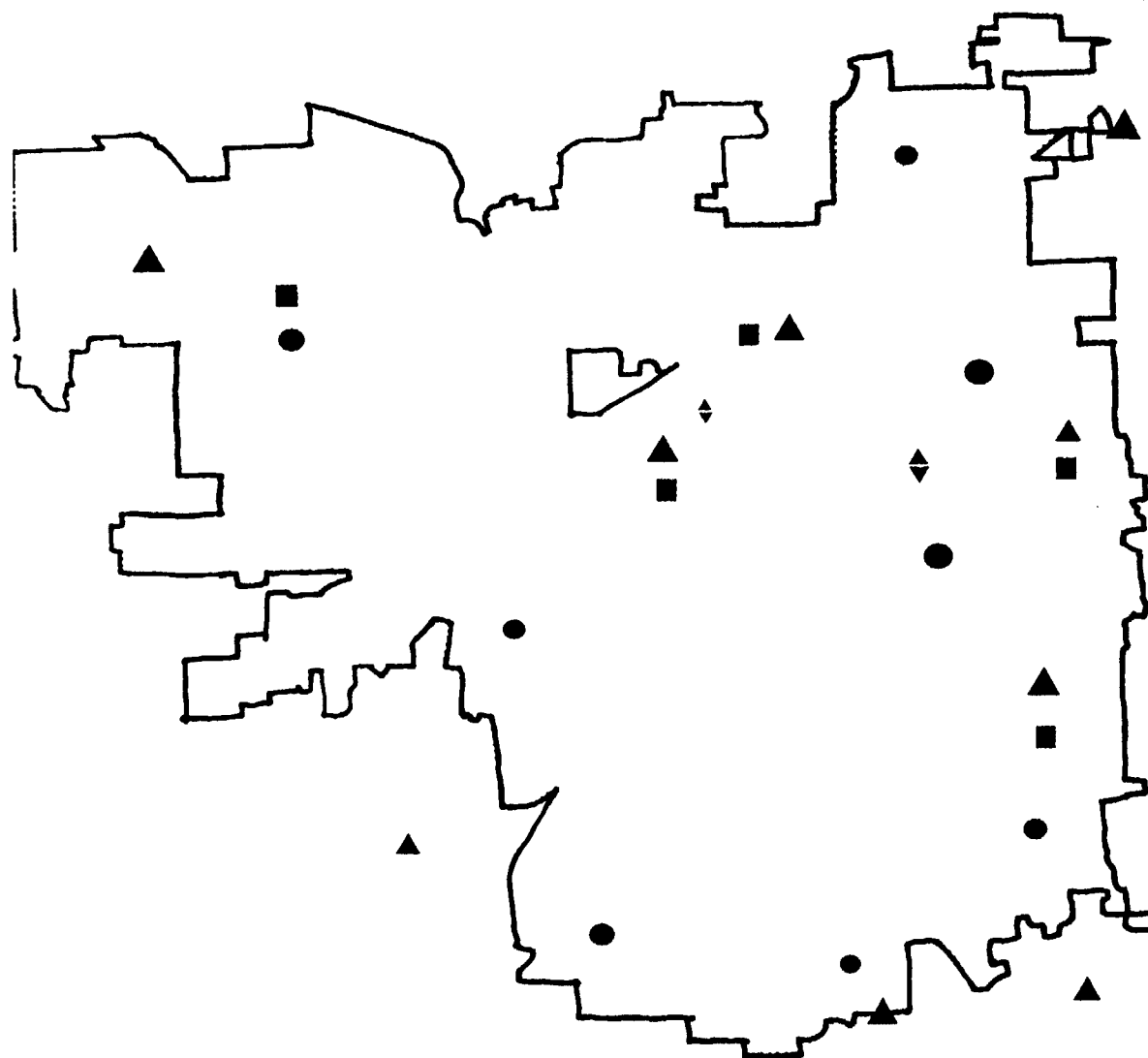
B. Define CII eligibility by reference to Rule Part 90 definitions (§90.7):

1. "Power Licensee" -- electric, gas, or water production or delivery
2. "Petroleum Licensee" -- petroleum or gas production or delivery
3. "Railroad Licensee" -- passenger or property railroad carrier

City of Lincoln

Legend

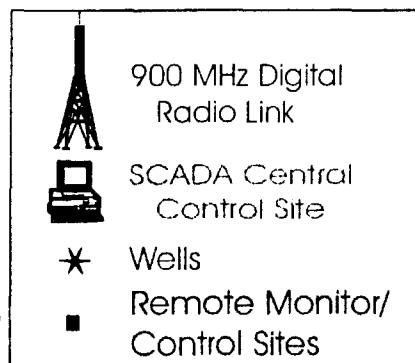
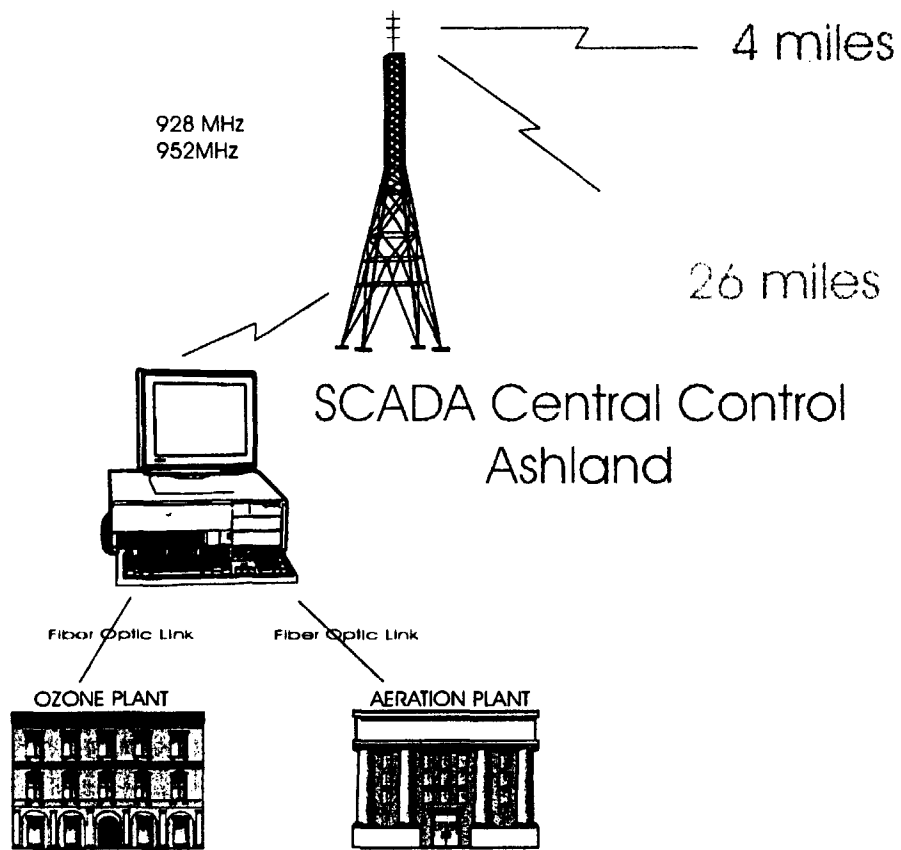
- ◆ Valve Control
- ▲ Reservoirs
- Pump Stations
- Pressure Monitor



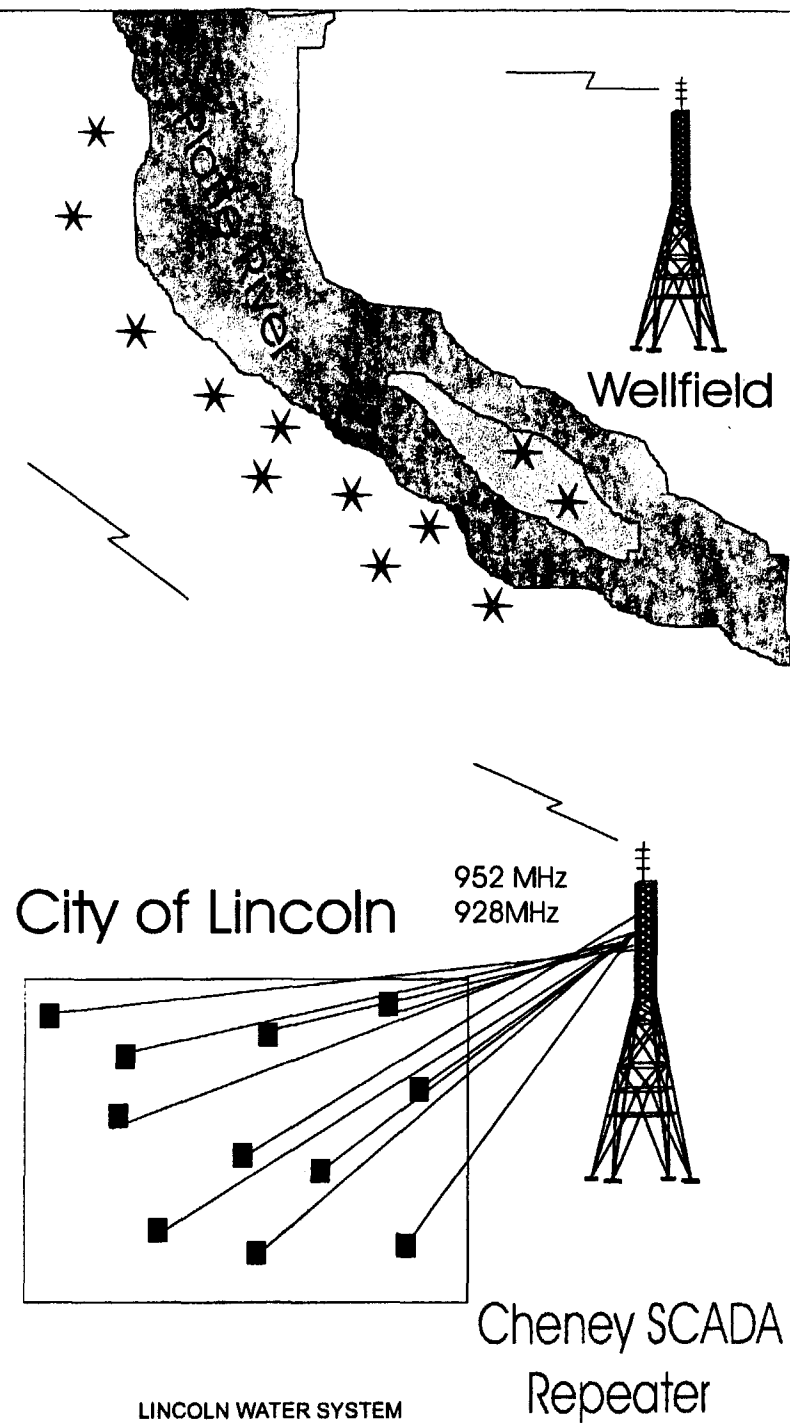
Cheney SCADA
Repeater

PREPARED FOR
AMERICAN WATER WORKS ASSOCIATION

LINCOLN WATER SYSTEM
WIRELESS DATA COMMUNICATION



PREPARED FOR
AMERICAN WATER WORKS ASSOCIATION



[illegible]

1	MOBILE RADIO TRANSMITTER SITE	6	CH2 ANALOG MICROWAVE
2	PAGING TRANSMITTER SITE	8	CH1 DIGITAL MICROWAVE
3	SCADA MASTER TRANSMITTER SITE	13	CH4 DIGITAL MICROWAVE
4	SITE SERVICES 4 RTU'S	2	CH5 SPREAD SPECTRUM DIGITAL MICROWAVE
5	SITE SERVICES 7 RTU'S		FIBER OPTIC LINK
6	SITE SERVICES 32 RTU'S		DASHED PATHS ARE FUTURE LINKS
7	SITE SERVICES 4 RTU'S		
8	SITE SERVICES 20 RTU'S		
9	SITE SERVICES 20 RTU'S		

SEPT. 1997

GRAPHIC BY MECHANICAL/ELECTRON ENGINEERING SECTION

40 FTJ'S SERVED BY MICROWAVE AND/OR WIRELINE